

1 off-hour technical support.¹⁰ Presumably the RCMC off-hour duty supervisor,
2 who is already in place, could manage the occasional need for this technical
3 support.

4 **Q. IS VERIZON CORRECT WHEN IT CLAIMS THAT THE WEEKEND**
5 **PORTING SOLUTION WHICH VERIZON CURRENTLY OFFERS IN**
6 **MASSACHUSETTS AND PENNSYLVANIA DOES NOT “IMPEDE**
7 **AT&T’S ABILITY TO PROVISION LNP FOR NEW CUSTOMERS**
8 **AFTER HOURS?”¹¹**

9
10 A. No. As AT&T pointed out in its Petition and in the Direct Testimony of William
11 Solis, the weekend porting solution which Verizon currently offers is
12 inadequate.¹² Instead of responding to AT&T’s explanation of the inadequacy of
13 the weekend porting solution, an explanation provided more than three months
14 before the direct testimony was due to be filed in this case, Verizon simply
15 repeated its blanket assertion that its solution was adequate.

16 **Q. DID VERIZON STATE THAT ITS SYSTEMS ARE INCAPABLE OF**
17 **HANDLING A SATURDAY DUE DATE FROM A CLEC, ONE OF THE**
18 **FOUR ELEMENTS AT&T IS SEEKING TO BE ABLE TO PORT**
19 **NUMBERS EFFICIENTLY AND EFFECTIVELY?**

20
21 A. No. In fact, in response to AT&T Data Request 8-7, Verizon acknowledged that
22 its representatives can and do enter a Saturday due date when scheduling an
23 installation for a Saturday.¹³

¹⁰ Both of the following links to Verizon’s CLEC Handbook inform CLECs that they may call the RCMC after hours and reach the duty supervisor to handle any issues that need immediate attention. *See* http://www22.verizon.com/wholesale/frames/generic_frame_east/0,2656,con_clec,00.html; http://128.11.40.241/east/wholesale/resources/res_datedue_change.htm.

¹¹ Verizon VA’s Direct Testimony on Non-Mediation Issues (Categories I and III – VII) at 30.

¹² AT&T Petition at 240-41; Direct Testimony of William Solis at 16.

¹³ *See* Verizon Response to AT&T Data Request 8-7, attached hereto as Exhibit 1.

1 **Q. DOES VERIZON ALLOW RESELLERS TO ORDER WEEKEND**
2 **SERVICE INSTALLATIONS FOR THEIR END USERS?**

3
4 A. No. In response to AT&T Data Request 8-8, Verizon acknowledged that, despite
5 the fact that its own representatives can order service installations for Saturdays,
6 Verizon does not permit resellers to offer Saturday installations at this time. If
7 Verizon's own representatives have this ability, Verizon must allow CLECs this
8 ability to comply with the non-discrimination requirements of the Act.

9 **Q. IF VERIZON INSTALLS LOCAL EXCHANGE SERVICE FOR ITS OWN**
10 **RETAIL RESIDENTIAL AND BUSINESS CUSTOMERS DURING THE**
11 **OFF-HOURS AND WEEKENDS, SHOULD VERIZON BE REQUIRED TO**
12 **PROVIDE FULL SUPPORT TO ALLOW AT&T TO PORT A NUMBER**
13 **DURING OFF-HOURS AND ON WEEKENDS?**

14
15 A. Yes. When Verizon installs local service on a Saturday for its own customers,
16 that it is the functional equivalent of AT&T porting a number from Verizon to
17 AT&T on a Saturday. To comply with the non-discrimination requirements of the
18 Act, Verizon should be required to provide full support to allow AT&T to install
19 local service for its customers and, as part of that installation, port that customer's
20 number away from Verizon.

ISSUE V.13

**Should Verizon Be Required To Receive Confirmation Of
A Port From NPAC Prior To Disconnecting A Ported
Number?**

21
22 **Q. SHOULD VERIZON'S COMPLIANCE WITH ORDERING AND**
23 **BILLING FORUM ("OBF") STANDARDS ABSOLVE VERIZON FROM**
24 **OBTAINING CONFIRMATION FROM NPAC THAT A PORT HAS**
25 **SUCCESSFULLY COMPLETED PRIOR TO DISCONNECTING THE**
26 **NUMBER?**

27
28 A. No. AT&T wants practices between Verizon and AT&T in this interconnection
29 agreement which will insure that both parties take reasonable steps to minimize, if

1 not eliminate, the risk of a customer's loss of dial tone. Compliance with the
2 OBF standards does not necessarily reach this goal.

3 **Q. HAS VERIZON MADE ANY STATEMENTS WHICH WOULD MERIT A**
4 **REQUIREMENT THAT VERIZON RECEIVE CONFIRMATION OF A**
5 **PORT FROM NPAC PRIOR TO DISCONNECTING A PORTED**
6 **NUMBER?**

7
8 A. Yes. By Verizon's own statements, it has been their experience that ports often
9 do not take place on the committed due date.¹⁴ If "ports often do not take place on
10 the committed due date," Verizon should be more than willing to take this simple
11 step to insure that Verizon does not remove the translations from the switch
12 before the port has actually occurred and thereby insure that the end user's dial
13 tone is protected.

14
15 **Q. HOW DO YOU RESPOND TO VERIZON'S ASSERTION THAT AT&T IS**
16 **ASKING VERIZON TO MODIFY ITS PRACTICE ONLY FOR AT&T?**¹⁵

17
18 A. This is simply another example of Verizon wanting to provide the minimum level
19 of service possible. AT&T has demonstrated that this requested practice is good
20 for competition and for consumers. Similarly, AT&T has demonstrated that this
21 practice is technically feasible. If it is more efficient for Verizon to provide the
22 improvements AT&T seeks to all CLECs, Verizon is free to do so and probably
23 should do so.

14

Verizon VA's Direct Testimony on Non-Mediation Issues (Categories I and III – VII) at 31.

15
Verizon VA's Direct Testimony on Non-Mediation Issues (Categories I and III – VII) at 31.

1 **Q. IS VERIZON’S RELIANCE ON THE SUPPLEMENTAL LSR PROCESS**
2 **ADEQUATE TO PROTECT A CUSTOMER’S DIALTONE IN THE**
3 **EVENT THAT A PORT CANNOT BE COMPLETED ON THE**
4 **ORIGINALLY AGREED UPON DUE DATE?**

5
6 A. No. As discussed in my Direct Testimony, circumstances may still arise where
7 the supplemental LSR process does not provide adequate protection to the
8 customer. For example, assume that both AT&T and Verizon have done all of the
9 advance work that they need to do to transfer service from Verizon to AT&T.
10 However, on the scheduled due date, the AT&T technician arrives at the
11 customer’s door at the scheduled afternoon appointment and the customer tells
12 AT&T that he has changed his mind. He wants to remain with Verizon. Under
13 Verizon’s construct, AT&T would have to submit a supplemental LSR and walk
14 it through Verizon’s systems to ensure that the translations for the customer’s
15 number were not removed as scheduled at 11:59 that night, less than 12 hours
16 away.

17 If Verizon were required to obtain confirmation from NPAC before the
18 translations were removed, Verizon would check NPAC that evening and would
19 find no such confirmation. In that instance, Verizon would leave the translations
20 in place and the supplemental LSR would catch up to the systems and the
21 customer would not lose service.

22
23 **Q. IS VERIZON CORRECT IN STATING THAT “AT&T HAS OFFERED**
24 **NO SOUND REASON IN THIS PROCEEDING AS TO WHY SUCH A**
25 **PROCESS SHOULD NOW BE ADOPTED BY VERIZON VA?”**

26
27 A. No. In its Petition, AT&T set forth a detailed explanation outlining the reasons
28 why Verizon should be required to confirm the successful completion of the port

1 with NPAC prior to disconnecting the number from the switch.¹⁶ AT&T provided
2 additional explanation in the Direct Testimony.¹⁷

3
4 **Issue V.7. Should Verizon Commit To Specific Intervals For Local Number**
5 **Portability Provisioning For Larger Customers?**
6

7 **Q. IS THERE AN ESTABLISHED INDUSTRY GUIDELINE REGARDING**
8 **NUMBER PORTABILITY FOR MORE THAN 200 NUMBERS?**
9

10 A. No. Verizon acknowledges that there is no industry guideline.¹⁸ Nonetheless,
11 Verizon summarily states that its negotiated interval is “reasonable.”¹⁹ Frankly, if
12 the negotiated interval for porting more than 200 numbers was, in fact,
13 “reasonable,” AT&T would not be arbitrating this issue.

14
15 **Q. VERIZON CLAIMS THAT MANY FACTORS INFLUENCE THE**
16 **AMOUNT OF WORK REQUIRED TO PORT A LARGE CUSTOMER.²⁰**
17 **ARE THESE CLAIMS SUPPORTED?**
18

19 A. There may be more work involved with *some* orders to port more than 200 lines.
20 For example, if, AT&T wants to port 200 out of 400 lines that a customer
21 currently has with Verizon, Verizon may have work to do with regard to line
22 hunting arrangements or rearranging the main billing account. However, most of
23 the work will need to be handled by the new service provider. In the limited
24 instances where such additional work requires Verizon more than five business
25 days to port the numbers are the exception and should not be the benchmark for

16 AT&T Petition, 4/23/01, at 250-253. Verizon did not respond to that explanation in its direct testimony.

17 Direct Testimony of William Solis at 17-25.

18 Verizon VA’s Direct Testimony on Non-Mediation Issues (Categories I and III – VII) at 26.

19 *Id.*

1 the rule. Verizon should be required to commit to five business days for porting
2 more than 200 numbers as a rule *unless* Verizon can provide AT&T with a
3 justification as to why the work cannot be done within five business days.²¹

4 **Q. HAS VERIZON PROVIDED A VIABLE EXPLANATION AS TO WHY IT**
5 **CAN PORT 101-200 LINES WITHIN FIVE DAYS BUT NOT 201 LINES**
6 **WITHIN FIVE DAYS?**

7
8 A. No. As AT&T repeatedly has explained, porting numbers only is a relatively
9 simple process which largely requires alterations to software and systems, not to
10 hardware. The relative ease of porting a large number of telephone numbers is
11 also shown by the fact that Verizon can port between 101 and 200 lines within
12 five business days. Verizon has provided no reason to explain or justify why it
13 can port 101-200 telephone numbers within 5 days, but it cannot port more than
14 200 telephone numbers in that same established interval.

15 **Q. VERIZON CLAIMS THAT THE LACK OF AN ESTABLISHED**
16 **INTERVAL FOR LARGE CUSTOMERS DOES NOT IMPEDE AT&T'S**
17 **ABILITY TO PROVIDE SERVICE TO ITS NEW CUSTOMERS.²² IS**
18 **VERIZON RIGHT?**

19
20 A. No. Verizon suggests that large business customers are used to waiting long
21 intervals to port their service or to change providers. Therefore, reasons Verizon,
22 the lack of an established interval for porting more than 200 numbers should not
23 impede AT&T's ability to serve this class of customer. Verizon misses the point.

²⁰ Verizon VA's Direct Testimony on Non-Mediation Issues (Categories I and III – VII) at 27.

²¹ Verizon stated in response to AT&T Data Request 8-1 that "removal of network trunks to customer premises" and "rearrangement of main billing account" also increase the work effort needed to complete some orders for porting more than 200 lines. These are work issues which impact Verizon's network. These issues can be addressed after the numbers are ported. There is no technical reason why these issues should be permitted to delay the implementation of the customer's carrier of choice. A copy of Verizon's Response to AT&T Data Request 8-1 is attached hereto as Exhibit 1.

1 Regardless of whether large business customers are used to waiting long intervals
2 for the transfer of phone service, AT&T wants to be in the position to give a large
3 business customer a firm commitment of five business days. There is no technical
4 reason why Verizon cannot, as a rule, port more than 200 numbers within five
5 days for simple ports and, as an exception to that rule, handle complex orders for
6 more than 200 numbers in five days or more, as negotiated with the winning
7 carrier.

8
9 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

10
11 **A. Yes.**

I, William J. Solis hereby swear and affirm that the foregoing rebuttal testimony was prepared by me or under my direct supervision or control and is true and accurate to the best of my knowledge and belief.

Signed:

William J. Solis

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-1 In its Response to Issue V-7, filed May 31, 2001, Verizon stated “If the order is relatively simple and does not require any network reconfigurations, the interval will reflect the complexity of work to be done and will be completed in a short interval. If the order is complex, depending on the work required the interval will be longer.” Please describe in detail the specific types of “network reconfigurations” which might be involved with a request solely to port 200 or more telephone numbers, without unbundled loops.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states as follows:

Network reconfigurations that might be involved in such a request include:

- change line hunting arrangements
- reconfigure Centrex line features
- removal of some network trunks to customer premises
- rearrange main billing account

VZ VA #232

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-2 During off-hours and weekends, specifically state whether Verizon dispatches field technicians to customer premises and/or to central offices to provide installation, repair, and/or maintenance for

- a. residential end users
- b. small business customers
- c. large business customers

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states as follows:

Enterprise Field Operations, which serves the larger business customers, maintains a skeletal crew in the evening and during the day on weekends to dispatch for repair purposes. Installation may also be done in the evening by the skeletal crew, if Verizon has been unable to meet the due date during normal business hours. Installation dates are not offered on the weekends, but installation may occur on the weekend in support of a weekend cutover that has been prearranged by the customer, at the customer's expense.

Enterprise Field Operations will also "call out" a technician on an emergency basis when a customer has a mission critical outage. However, the "call out" will only occur after the Verizon Maintenance Control Office tests the circuit and the trouble points outside, the customer guarantees access to the Minimum Point of Penetration and any intermediate distribution frames for an extended demarc, and after the customer agrees to accept a maintenance visit charge at the overtime rate should the trouble prove to be on the customer's side of the demarcation point.

Customer Operations - Potomac, which serves the residential and small business markets in Virginia, provides service as follows:

Installation

Monday through Friday Work is generally scheduled between the hours of 8am and 5pm with 20% of the scheduled force available between 5pm and 9pm. Limited work is scheduled on Saturdays and only with pre-approval. Outside of these normal hours, installation would only be performed on an emergency bases. Duty supervisors are available outside of normal operating hours to deal with these situations.

Repair

Exhibit 1 to Rebuttal Testimony of William Solis

Monday through Friday 8am to 9pm, Saturday 8am to 7pm and Sunday 8am to 5pm. Holidays are also staffed with either Saturday or Sunday coverage, depending upon the type of holiday. Work performed outside of the above mentioned hours would be performed on an emergency bases. Duty supervisors are available outside of normal operating hours to deal with these situations.

VZ VA #233

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-3 Describe in detail the repair and maintenance staff that Verizon maintains during off-hours and weekends, including, but not limited to, the types of personnel at work and/or on call, the locations where those personnel work or are called into work, if needed.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states as follows:

Weekend maintenance staffing - Enterprise Field Operations:

- ❑ **Northern Virginia typical outside coverage:**
 - ❑ 4 technicians assigned on Saturday
 - ❑ 1 technician assigned on Sunday
 - ❑ Technician title can be Service or System technician
 - ❑ Typical coverage: 8 – 430 pm
 - ❑ Reporting locations: 2
 - ❑ One duty Team Leader
 - ❑ Field team leader assumes accountability for call outs during hours Center is not available.
- ❑ **Southern Virginia typical outside coverage:**
 - ❑ 9 technicians assigned on Saturday
 - ❑ 7 technicians assigned on Sunday
 - ❑ Technician title: Service or System technician
 - ❑ Typical coverage: 8 – 430 pm
 - ❑ Reporting locations: 15
 - ❑ One duty Team Leader
 - ❑ Field team leader assumes accountability for call outs during hours Center is not available.
- ❑ **CSC Support**
 - ❑ Typically 3 assigned on Maintenance Administrators for Saturday and Sunday (2 Southern VA./1 Northern Va.)
 - ❑ One duty Team Leader
- ❑ **Off Hours Support**
 - ❑ The Center maintains a 4 – 12 evening supervisor
 - ❑ Several late tours are maintained to meet service needs:
 - ❑ Northern Virginia: 12 midnight - 8am, 10am – 7pm
 - ❑ Southern Virginia: 4 – 12midnight, 12pm – 8:30pm, 10am – 7pm
 - ❑ Depending upon the area and skill sets required, technicians might be called at home to assist in meeting customer needs, if an assigned technician is not available. The dispatch center is

Exhibit 1 to Rebuttal Testimony of William Solis

accountable for this activity until 12 midnight, Monday through Friday. After 12 midnight, a Field team leader is accountable for this activity by Manager group until 8am the next business day. The manager group in this case is determined by geography, Northern Virginia versus Southern Virginia.

- During the weekends/holidays, the dispatch center is accountable for ensuring that all service requests are met on time and coordinating efforts with the assigned field team leader. Typically, an available list is developed by geographic area, facilitating a better match of available technician to customer needs.

Weekend maintenance staffing - Customer Operations-Potomac:

Staff would fall into two broad categories, support (inside) and field (outside technicians).

Support (Inside)

Inside support dispatching personnel are scheduled Monday through Friday 6AM to 10PM, Saturday 6AM to 7PM, and Sunday 6AM to 5PM. Holidays are also staffed with either Saturday or Sunday coverage, depending upon the type of holiday.

- Call answering / Repair service is open 24 hours a day 7 days a week to take customer service requests.

Off Hours and Weekends (Inside)

On Saturday, 33% of the workforce is scheduled. On Sunday, 15% of the workforce is scheduled. Holiday coverage ranges from 15% to 33% of the workforce, depending upon the type of holiday. Associates would rarely be called in outside of the above staffing guidelines, due primarily to the fact that our operating systems allow our technicians to gather required information by remote access. These personnel are spread over five locations in Virginia.

- Stafford
- Richmond
- Norfolk
- Roanoke
- Fairview Park

Off Hours and Weekends (Outside Technicians)

Monday through Friday, 20% of the workforce is scheduled until 9PM. On Saturday, 33% of the work force is scheduled. On Sunday, 15% of the workforce is scheduled. Holiday coverage ranges from 15% to 33% of the workforce, depending upon the type of holiday. Outside of

Exhibit 1 to Rebuttal Testimony of William Solis

these staffing guidelines duty supervisors would make the determination if a dispatch were required. There are 7 duty supervisors geographically assigned throughout the state. If required they would contact available technicians for dispatch. These technicians are spread over fifty-two locations in Virginia.

VZ VA #234

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-4 When AT&T informs Verizon during business hours on a weekday that a port will not occur as scheduled, detail the work effort that Verizon undertakes to insure that the end user's telephone number is not removed from Verizon's switch that night at 11:59 pm. As part of the response, please be sure to include the following:

- a. how many technicians are involved in the effort;
- b. the specific tasks that need to be performed;
- c. the average time that it takes to complete the entire work effort (to the nearest 15 minute increment); and
- d. where this work is typically performed, e.g. central office, network operations center, or other location.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states as follows:

The following information assumes that the port out is either postponed or canceled on the date due, and that the port out is simple, not coordinated (*i.e.*, the number has a 10 digit trigger applied and no additional network re-arrangements are required).

Straight "port out" events are handled as "flow through" disconnect orders by Verizon. In the event of a change on date due, AT&T notifies the Verizon Regional CLEC Coordination Center (RCCC) by phone that the port out has been delayed or canceled. The RCCC Coordinator reviews the service order details and identifies the responsible Verizon Switching organization (RCMAC). The RCCC Coordinator notifies the RCMAC of the need to change the date due or cancel the order altogether. The RCMAC contact accesses the MARCH system and makes the appropriate changes. A Verizon Service Representative (RCCC or NMC) accesses the order and changes the date due per the CLEC instructions or supplemental LSR. At least three Verizon technicians are involved: RCCC, RCMAC, and NMC. This process usually takes only about 15 minutes. The work is performed at the RCCC, RCMAC, and NMC.

VZ VA #235

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-5 In light of the response to 4, is there any reason why the work effort would take longer or require more technician involvement during off-hours or on a weekend? If so, describe in detail the additional work effort or involvement required.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states as follows:

The work required by Verizon to manage the above-described same day postponements or cancellations would be the same during off-hours or weekends as during normal business hours. Verizon, however, does not maintain the same staffing levels during off-hours or on weekends as it does during normal business hours. This, Verizon would incur significant expense if it had to schedule the necessary personnel in the RCCC, RCMAC, and NMC to manage last minute changes requested by AT&T during such times.

VZ VA #236

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-7 Describe in detail the process that a Verizon representative uses to schedule the installation of local exchange service for residential customers on a Saturday, including but not limited to an identification of the operation support systems used, whether those systems accept a Saturday due date, and, if available, the particular USOC(s) entered to permit the scheduling of a Saturday due date.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states that it does not regularly schedule installation of local exchange service for residential customers on a Saturday. Such changes are, however, scheduled on a case-by-case basis in the manner described in Verizon VA's response to ATT request 1-43.

If a Saturday installation were requested, Verizon representatives would contact the appropriate support center in the state and request a Saturday dispatch. Once approval is granted a note would be placed in the remark section of the service request for reference. The order is then updated with the appropriate commitment date and released in ExPress Trak. There are no system restrictions to this process. The job would then be held until the Saturday requested and loaded to a technician for completion.

VZ VA #238

Exhibit 1 to Rebuttal Testimony of William Solis

VERIZON RESPONSE TO AT&T DATA REQUESTS

ITEM: AT&T 8-8 Describe in detail the process that a representative of a CLEC reselling Verizon service uses to schedule the installation of local exchange service for residential customers on a Saturday, including but not limited to an identification of the operation support systems used, whether those systems accept a Saturday due date, and, if available, the particular USOC(s) entered to permit the scheduling of a Saturday due date.

REPLY: Subject to its previously filed Objections and without waiver of same, Verizon VA states that it does not schedule the installation of resold accounts on Saturdays.

VZ VA #239

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician at the FCC Reference Information Center, at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

1 Diskette